

FAQ HCBS Prevocational and Supported Employment Services

	Question	Response
General Questions	Is this something new, or has this been in the works for awhile?	The Rules in ARRC 2471c, and the new HCPS codes and rates, are the culmination of several years of “systems change” projects involving DHS, IVRS, and other partners. You may know this effort as “Medicaid Employment Redesign” which has involved staff and national technical experts from the ICIE (Iowa Coalition on Integrated Employment), E1st (Employment First State Leadership Mentor Project), and SELN (State Employment Leadership Network). This effort has been evolving since 2009, and in earnest since 2012.
	Where do I find these Rules?	Please refer to Informational Bulletin 1665 for detailed information including links to the administrative rules. https://dhs.iowa.gov/sites/default/files/1665_HCBSPrevocationalandSupportedEmploymentServiceChanges.pdf
	How and why was the May 4th date chosen?	The effective date of May 4, 2016 is purely a function of the administrative Rules timeline; this date results from the date the Rules were officially filed
	It is my understanding that DHS will work with the MCOs, requiring them to change contracted work services rates to the new schedule. If this is not correct, please advise.	The fee scheduled posted on the IME Fee Schedule website at: https://dhs.iowa.gov/ime/providers/csrp/fee-schedule has been shared with the MCOs. The MCOs are in the process of making the changes needed to implement the new rules.
	Will these codes and fees be automatically given to the three MCO'S, or do we have to contact the MCO'S and negotiate with someone to get them added to our contracts?	See response above. The rates paid by the MCOs are negotiated between the MCOs and their providers, the IME can not address to the MCOs reimbursement negotiations. Providers serving FFS members and billing the IME will be paid at the posted Fee Schedule rate.

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	Does this rule and fee schedule change include employment services funded by habilitation?	Yes. The provider qualifications, service definitions and reimbursement methodologies and rates are now consistent across the HCBS ID and BI Waivers and the Habilitation program.
	I knew the rules were passed, but I thought I saw something that said the fees could not be implemented until CMS approves Iowa's proposed waiver amendments. Did that happen?	The department has chosen to implement the changes up[on the effective date of the administrative rules and will be submitting the state plan amendment and waiver amendments adopting the changes.
	On the first page of the flowchart, near top left, it says if 24+ and needs career exploration, apply to IVRS. I know it's kind of late, so maybe I'm just confused, but I thought these individuals worked through waiver? If you could clarify, would be greatly appreciated! (via IACP email 4/29)	What the box actually says, for both Medicaid members who are in prevocational already and also those not yet in prevocational, "If the member is 24+ years old, authorize Career Exploration and assist them to apply to IVRS. ..."
	The rules state that the waiver can not pay for services that are available through VR or the department of education is a denial letter required from IVRS or the Dept. of Ed before Prevocational or Supported Employment services can be authorized under the HCBS programs?	<p>Medicaid does not require a denial letter from IVRS or the Dept. of Education in order for members to access like services through the waivers or Habilitation.</p> <p>To meet this requirement the Case Manager, or Care Coordinator documents in the member's person centered service plan that the reason that services are not available through IVRS or the school system for members still in school. This is outlined on Page 65 of the HCBS Provider Manual.</p> <p>https://dhs.iowa.gov/sites/default/files/HCBS.pdf</p> <p>This is also outlined in administrative rule 441 IAC 78.27(10)(f)</p>

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	Define commensurate experience	Commensurate experience is defined as: work experience that would equal to the educational requirement. If a BS is a four year degree then in lieu of the 4 year degree we would expect to see four years of work related experience in either organizational or community employment.
Provider Qualifications	The new education / experience requirements for a staff providing Individual Supported Employment require a Bachelors degree or commensurate experience, preferably in human services, sociology, psychology, education, human resources, marketing, sales or business. My question is: would a combination of education and commensurate experience qualify? For example an Associate degree and commensurate experience	Yes, a combination of commensurate experience and education is acceptable.

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	<p>For individual supported employment the rules state “nationally recognized certification (ACRE or CES) as an employment specialist.”</p> <p>For job coach the rules state “nationally recognized certification in job training and coaching.”</p> <p>For direct support pre-voc staff the rules state “9.5 hours offered through Direct Course or ACRE.</p> <p>The employment services training we currently receive through IACP is called College of Direct Support through U of IA. Is Direct Course the same as College of Direct Support?</p>	<p>Yes the Direct Course/ College of Direct Support - Employment Supports is the IACP sponsored training and may be used to meet the 9.5 hours training requirements.</p>
	<p>For Employment specialist certification. training, does this include both of the following:</p> <ul style="list-style-type: none"> • College of Employment Services (through CDS) course completion for employment specialist where a person obtains a certificate of completion from IACP • IA-APSE (ACRE certified) two day job development training and additional coursework where a person obtains a certificate of completion from APSE 	<p>For the 9.5 hours of initial training and 4 hours of annual continuing education, the dept. recognizes the training offered through APSE or IACP; and for credentialing and certification we recognize any nationally recognized employment specialist certification for ISE, and for the LT Job Coaching and Group Employment we recognize the training course offered through APSE or IACP.</p>

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	Do current career counselors/job coaches that are employed by the schools need to meet the new certification guidelines	Any provider billing the IME or MCOs for Prevocational or SE services must meet the staff training requirements in rule.
	Within Individual Supported Employment Staff Qualifications – if I have staff currently working as Job Developers who do not meet the requirement for a BA or commensurate experience (4 years) quite yet, will they be able to work under the new rules?	<p>Yes, we would expect the staff already in place and working to meet both requirements within the 24 month time frame.</p> <p>(1) Individual supported employment: bachelor's degree or commensurate experience, preferably in human services, sociology, psychology, education, human resources, marketing, sales or business. The person must also hold nationally recognized certification (ACRE or College of Employment Services (CES) or similar) as an employment specialist or must earn this credential within 24 months of hire. The (CES) or similar as an employment specialist or must earn this credential within 24 months of hire.</p>
	If an Employment Specialist has their Job Coaching/Job Development certification and has a Bachelor Degree or commensurate experience, do they still need the 9.5 hours of employment training in addition to this if they also do Long Term Job Coaching????	If the staff person hired to provide the Job Coaching or Individual Supported Employment services, holds Certified Employment Specialist Certification (CESP) or other nationally recognized certification in Job Coaching, then they already exceed the 9.5 hours of training within 6 months of hire requirement and would be considered to be compliance with the requirement

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	<p>Where do I find the 9.5 hours of employment training?</p>	<ul style="list-style-type: none">• DirectCourse is available to all Iowa HCBS providers at no charge through IACP, regardless of IACP membership See directcourse@iowaproviders.org or visit www.iowaproviders.org and click on “DirectCourse”• Iowa-APSE offers ACRE approved Community Employment Services Training at least four times annually See http://www.iowa-apse.org/
	<p>7.25(9) Supported employment habilitation (1) Individual supported employment: bachelor’s degree or commensurate experience, preferably in human services, sociology, psychology, education, human resources, marketing, sales or business. The person must also hold nationally recognized certification (ACRE or College of Employment Services (CES) or similar) as an employment specialist or must earn this credential within 24 months of hire</p>	<p>Clarification: The person providing Individual Supported Employment services has 24 months from the date of hire to meet the educational requirements and earn the Employment Support Professional certification.</p>

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	<p>(2) Long-term job coaching: associate degree, or high school diploma or equivalent and 6 months' relevant experience. A person providing direct support shall, within 6 months of hire or within 6 months of May 4, 2016, complete at least 9.5 hours of employment services training as offered through DirectCourse or through the ACRE certified training program. The person must also hold or obtain, within 24 months of hire, nationally recognized certification in job training and coaching.</p>	<p>Clarification: The person providing Long-Term Job Coaching services has 24 months from the date of hire to meet the educational requirements and complete the 40 hours ACRE-endorsed training curriculum in Employment Services.</p>
	<p>(3) Small-group supported employment: associate degree, or high school diploma or equivalent and 6 months' relevant experience. A person providing direct support shall, within 6 months of hire or within 6 months of May 4, 2016, complete at least 9.5 hours of employment services training as offered through DirectCourse or through the ACRE certified training program. The person must also hold or obtain, within 24 months of hire, nationally recognized certification in job training and coaching</p>	<p>Clarification: The person providing Long-Term Job Coaching services has 24 months from the date of hire to meet the educational requirements and complete the 40 hours ACRE-endorsed training curriculum in Employment Services.</p>

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Prevocational Services		An individual age 24 and above does NOT have to be referred to IVRS for Career Exploration. Of course, if the person wants to work and would need/benefit from IVRS services (which consist of employment services, including Career Exploration), they can always be referred to IVRS. IVRS does not have any age minimum or maximum, a person just needs to be able to – and expresses a desire - to WORK.
	Are Resume writing and interview skills that may previously been taught as a group in pre voc still able to be done that way under the new rules, or is it something now that needs to be done more individually under supported employment?	Prevocational services includes teaching skills related to obtaining employment which would include resume writing and interviewing skills training.
	If a person has started pre voc with one provider and then switches to another provider, does the clock start over for prevocational timing	The time is tied to the person and their service plan not the provider, so it would not start over if the member switches providers
	If a person has a Master's in Vocational Rehabilitation, do they still have to take the APSE test or can they appeal or be grandfathered in	The person would have to be able to demonstrate that their MVR provides the same curriculum as the national certification.

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	<p>If we have job coaches who were APSE certified in job coaching and job development last year, are they “grandfathered” in as meeting the requirement of the 9.5 hours (and go to the 4 hours annually) or do they have to start with the 9.5 hours effective May 4th?</p>	<p>Re: 77.25(9) Supported employment habilitation</p> <p>(2) Long-term job coaching: associate degree, or high school diploma or equivalent and 6 months’ relevant experience. A person providing direct support shall, within 6 months of hire or within 6 months of May 4, 2016, complete at least 9.5 hours of employment services training as offered through DirectCourse or through the ACRE certified training program. The person must also hold or obtain, within 24 months of hire, nationally recognized certification in job training and coaching.</p> <p>If staff are currently working and have completed the APSE certification prior to the new rules being implemented, we would consider the 9.5 hours of training to be met.</p>
Prevocational - Career Exploration	<p>Does the 34 hours of Career Exploration run concurrent with the 90 days in pre-voc, or is it 34 hours plus 90 days?</p>	<p>For members enrolled in Prevocational services on or before May 04, 2016 the 90 day clock starts after the member has completed the 34 hours of Career Exploration services by having a written career plan. The 34 hours of Career Exploration service may be authorized concurrently with Prevocational hourly services and occurs over a 90 day period of time. The 90 day period may occur at anytime during the 24 month period.</p>
	<p>Since Career Exploration is at a different rate than pre-voc, how will it be billed separately?</p>	<p>Prevocational and Career Exploration have two separate procedure codes which will be authorized in the members service plan. Prevocational hourly procedure code is T2015 and the Career Exploration procedure code is T2015 U3. The U3 modifier is used to differentiate between the two services.</p>

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	<p>How is career exploration different from individual supported employment? Currently our employment coordinator provides services that include employment preparation, planning, and support.</p>	<p>The differences in the two services is the expected outcome of the service. Career exploration is intended to develop a career plan that can then be utilized to identify the ongoing supports that a person may need to obtain and maintain employment.</p> <p>“Career exploration,” also referred to as “career planning,” means a person-centered, comprehensive employment planning and support service that provides assistance for waiver program participants to obtain, maintain or advance in competitive employment or self-employment. Career exploration is a focused, time-limited service engaging a participant in identifying a career direction and developing a plan for achieving competitive, integrated employment at or above the state’s minimum wage. The outcome of this service is documentation of the participant’s stated career objective and a career plan used to guide individual employment support.</p> <p>“Supported employment” means the ongoing supports to participants who, because of their disabilities, need intensive ongoing support to obtain and maintain an individual job in competitive or customized employment, or self-employment, in an integrated work setting in the general workforce at or above the state’s minimum wage or at or above the customary wage and level of benefits paid by the employer for the same or similar work performed by individuals without disabilities. The outcome of this service is sustained paid employment at or above the minimum wage in an integrated setting in the general workforce in a job that meets personal and career goals. Supported employment services can be provided through many different service models.</p>
	<p>Is career exploration part of pre-voc or individual supported employment, or both?</p>	<p>Career Exploration is a Prevocational service and may also be an activity through Individual Supported Employment for those folks not choosing to participate in the Career Exploration service through a Prevocational service provider.</p>

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	Members served in our pre-voc program are typically served from 8:15 A.M. to 1:45 P.M. Can we include their half hour lunch time in our billable hours since they are in the program during that time?	Meal time support is not considered a prevocational service and is therefore not billable time.
	Can we bill for services that help individuals with volunteer opportunities? In 78.27(9) page 8 it says it is part of pre-voc but on page 9 it is excluded. This seems to be conflicting information.	A member may participate in volunteer opportunities that provide work experiences during Prevocational services; however that does not include support for members volunteering in for-profit organizations and businesses other than for-profit organizations, or businesses that have formal volunteer programs in place (e.g., hospitals, nursing homes), and support for members volunteering to benefit the service provider.
	<p>Currently we have to reach 4.25 hours to bill a unit for a day. If a client leaves early for any reason, we do not get to bill for a partial day. Under the new hourly rates, will we have to reach a threshold for hours in a day to bill or could we bill for one hour in a day?</p> <p>- Is there any rounding for the hour? Our clients are typically scheduled 5.5 or 6.5 hours in a day. Can you bill partial units? If so, what is the break down, half or quarter hours for example. Is there any rounding? If a client trains 3 hours and 39 minutes for example, do we round down to 30 minutes, round up to 40, not get paid for that time at all because it didn't reach a full hour?</p>	<p>Hourly services should be rounded as follows:</p> <ul style="list-style-type: none"> • Add all the minutes provided for a day • When the total minutes for the day is less than 60, round up to one (1) whole unit • When the total minutes for the day is more than 60, divide the total by 60 to get the number of hours for the day. This should be rounded to the nearest whole unit, by rounding down for 1-30 minutes, and rounding up for 31-59 minutes

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Individual Supported Employment	Please clarify that the unit of service for Individual Supported Employment.	The unit of service for Individual Supported Employment is an hour.
	<p>Case Managers have been questioning our request for the Individual Supported employment service that we have requested, some saying that they would need something to justify the need for this service, since the lump sum was just issued in March.</p> <ul style="list-style-type: none"> • If we don't get the Individual SE for Job Development we won't be able to bill for any indirect supports which started May 4. • The old codes are gone, the lump sum is no longer a Medicaid service – we need to be authorized for a service that exists • If someone were to get a job, the initial job coaching has to be covered under the Initial Supported Employment, which we wouldn't have if they don't authorize it. 	<p>Providers authorized for Job Development (JD) in March 2016 were able to bill for the JD at the time the services were authorized in the members service plan. Those providers should have already gotten paid in April for JD services to assist the member to obtain a job. The unit of service for the \$955.00 payment under the old model is a job the member holds for 30 days, and even though the provider gets paid up front, the outcome is the member obtaining a job and holding the job for 30 days.</p> <p>If the member was authorized for JD and after May 4, 2016 the member still has not obtained a job, the SE-JD provider will need to provide the service documentation for the JD services provided to the member to evidence the provider's efforts and activities related to assisting the member to obtain a job before Individual Supported Employment may be authorized. This is due to the provider already receiving payment to "obtain a job" .</p> <p>If the service documentation provided for JD shows that reasonable efforts have been made and the individual still did not obtain a job, it would be reasonable to authorize Individual Supported Employment to continue to assist the member to obtain employment. If the provider cannot provide documentation of the JD activities or the documentation does not support the JD reimbursement already received, then authorization for ISE with that specific SE provider would not be appropriate. In these type of circumstances where the member still needs the services but the provider could not demonstrate the necessary outcomes, it would be most appropriate to locate a SE provider who may be better equipped to support the member in their job search activities.</p>

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		Initial Job Coaching 90 days to stabilization may be provided as part of the Individual Supported Employment service or as a Long Term Job Coaching service.
	Could you clarify the CMS definition & activity #16 “Systematic instruction and support during initial on-the-job training including initial on-the-job training to stabilization” as it relates to Individual Employment	Systematic instruction and support during initial on-the-job training including initial on-the-job training to stabilization” as it relates to Individual Employment allows for the Employment Specialist to continue to work with the member on the job while they stabilize in their job and have a “warm handoff” to the LT Job Coach. It would work the same if they were receiving “stabilization support” from IVRS with a “warm hand off” to the Medicaid HCBS LT Job Coach.

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	<p>Where does job coaching from placement to stabilization fall in this matrix? From the information in the webinar and explanatory handouts, I get the understanding that it should fall under Individual Supported Employment T2018 until stabilization is reached. Is that correct? Or will it be under Long Term Job Coaching</p>	<p>(updated 7/22/2016) Initial on the job training to stabilization may occur either through Individual Supported Employment if the annual limit on the number of units has not been met otherwise this will occur as Long Term Job Coaching Activity.</p> <p>78.27(10) Supported employment services</p> <p>(2) Expected outcome of service. The expected outcome of this service is sustained employment, or self-employment, paid at or above the minimum wage or the customary wage and level of benefits paid by an employer, in an integrated setting in the general workforce, in a job that meets personal and career goals. Successful transition to long-term job coaching, if needed, is also an expected outcome of this service. An expected outcome of supported self-employment is that the member earns income that is equal to or exceeds the average income for the chosen business within a reasonable period of time.</p> <p>(4) Individual employment strategies include but are not limited to: customized employment, individual placement and support, and supported self-employment. Service activities are individualized and may include any combination of the following:</p> <p>20. Initial on-the-job training to stabilization activity</p>
Long Term Job Coaching	<p>If we job coach someone a total of 9 hours a month which would be tier 3, but let's say that they call in the last day. This situation would put one in a different tier. Do we bill a different tier or do we lose out on the number of hours we job coached?</p>	<p>The Tier is based on the average hours worked over the course of a calendar month. The member remains in Tier 3 (H2025 U5) for the entire month. If the average hours over the course of the month fall below the 9 hour threshold and that is the new "average" for the person then the Tier would be changed to Tier 2 for the following month. The provider would bill for the Tier authorized for the current month and would then bill at the new Tier for the following month.</p>

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Transportation	Medicaid HCBS Employment Services rule changes going into effect May 4, 2016. Part of the rules now say that transportation to and from job sites can be bundled into the supported employment time and thus, billed under the supported employment code and rate. I just want to clarify that this is just an option. If we want to continue providing the transportation under T2003 HCBS Waiver Transportation and billing as a per trip service, we are allowed to do so as long as there is authorization for it, correct	The Supported Employment services; Individual Supported Employment , Group Employment and Long Term Job Coaching include transportation of the member during service hours. Community transportation options (such as driving oneself, carpools, public transportation, being transported by co-workers, families, volunteers, etc.) shall be attempted before the service provider provides transportation.
Procedure Codes and Rates	Will these codes and fees be automatically given to the three MCO'S, or do we have to negotiate with the MCO'S to get them added to our contracts?	The fee schedule posted on the IME Fee Schedule website at: https://dhs.iowa.gov/ime/providers/csrp/fee-schedule has been shared with the MCOs. The MCOs are in the process of making the changes needed to implement the new rules.
	How were the rates arrived at? Our prevocational hourly rates are better than this now.	The new rules comply with CMS's employment guidance and settings rules, and national technical experts helped us with a rate development model that incentivizes staff development for supported employment. We honored recommendations from our ad-hoc 2013 workgroup of providers, family members, and funders, and ultimately had to build rates that allowed the Medicaid budget for employment services to meet cost neutrality.
	Our floor rate for Prevocational Hourly is higher than the fee schedule. Will floor rates be honored?	The rates paid by the MCOs are negotiated between the MCOs and their providers, the IME can not address to the MCOs reimbursement negotiations. Providers serving FFS members and billing the IME will be paid at the posted Fee Schedule rate.

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	<p>We offer some group supported employment. For the ID waiver, we currently bill using code H2023 for group supported employment (no modifier). For Habilitation we bill using code H2023 UC (with a modifier). Thus, we are using slightly different billing codes depending on the payer. On the new rate sheet, there is no differentiation between the codes/modifiers for ID waiver and for Habilitation. Is it right, that we are to use the same codes/modifiers regardless if waiver or habilitation?</p>	<p>The procedure codes and Level II Modifiers are the same regardless of which program the service is provided under. The department will be able to identify which program the services were delivered under by the members waiver or Habilitation enrollment and the billing provider's number.</p>
<p>Prior Authorization of Prevocational and SE services</p>	<p>Where are the prior authorization requirements for employment services?</p>	<p>Please refer to Informational Letter 1665 for the prior authorization process for Fee-For-Service (FFS) members. https://dhs.iowa.gov/sites/default/files/1665_HCBSPrevocationalandSupportedEmploymentServiceChanges.pdf Prior authorization requirements for LTSS are in the MCO provider manuals: Amerigroup https://providers.amerigroup.com/Public%20Documents/!AIA_ProviderManual.pdf AmeriHealth Caritas http://becomeaprovider.amerhealthcaritas.com/pdf/iowa/provider-manual.pdf United Healthcare http://www.uhccommunityplan.com/content/dam/communityplan/healthcareprofessionals/provider-adminmanual/IA_UnitedHealthcare_Provider_Manual.pdf</p>

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Claims and Billing	<p>With move away from outcome payment in what was Job/Employer Development, how will the transition work to this new billing format? – Specifically, if I’ve been working for several months with a person to obtain a job and happen to find success shortly after May 4, is there any way to collect for the work we did prior to the rule change, or will I only be able to bill the few hours provided between 5/4 and the date the job was obtained?</p>	<p>Providers were able to bill for the job development at the time the services were authorized in the members service plan. For Job Development services authorized and claimed prior to May 4, 2016, providers should have billed for those services. If not, then the provider would need to claim the service for a date prior to May 4, 2016.</p> <p>If the provider has been reimbursed for Job Development and if the member still has not obtained a job, the provider will be asked to provide the documentation supporting their efforts to justify authorization of Individual Supported Employment. If the documentation evidences reasonable efforts towards helping the member obtain a job, it would then be justified to authorize Individual Supported Employment.</p> <p>(updated 7/22/2016) Individual Supported Employment may be authorized for up to 40 hours/ units per year initially and an additional 20 hours/ units within that year if they continue to need individual employment to obtain a job and stabilize a that job. Individual SE is prior authorized and limited to:</p> <p>Procedure Code: T2018 Initial authorization: \$65.47 per hour Not to exceed 40 hourly units Extended authorization: \$65.47 per hour Not to exceed 20 hourly units (updated 07/22/16)</p> <p>One initial and, if necessary, one extended authorization permitted per year not to exceed a total of 60 hourly units per year (updated 7/22/16) Total monthly cost for all supported employment services not to exceed \$3,029.00, per month</p>
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Settings	<p>Our organization is in the process of phasing out prevocational services, with a targeted end date of June 30, 2016. Our current program offers prevocational services in an segregated facility setting. The new rules indicated that prevocational services must be offered in an integrated community setting. Will we need to accelerate the closure of the segregated facility based prevocational program?</p>	<p>The requirements for a home and community based services to be delivered in community based settings are not new requirements. As part of the statewide transition, the state as well as providers must evaluate the experiences of members participating in services in terms of their participation and access to the community during service delivery. The state is required to be in full compliance with the CMS HCBS Settings requirements by March 17, 2019 at the latest. The state submitted an updated statewide settings transition plan (STP) to CMS on April 1, 2016. You can view the Statewide Transition Plan (STP) at http://dhs.iowa.gov/ime/about/initiatives/HCBS</p>
Iowa Vocational Rehabilitation Services (IVRS)	<p>Who is going to develop jobs and do job coaching for the high school students referred to VR? Will VR or school staff do it? Or does VR just refer to the provider and regulate/fund?</p>	<p>When the IEP student is still in high school, the job coaching is considered to be an instructional component of the IEP which is the responsibility of the school, if this need is a result of the student's disability. The school can either provide these services themselves or they can contract with another entity (i.e. a CRP) to provide the services. IVRS has agreed to cover the costs of the job development, per the Moan between IVRS and the DE. Any time these services are considered, a team meeting will be held to assure the team is on board with this decision. If a school chooses to purchase services through a CRP, IVRS can provide guidance if the school needs this, however, it is ultimately up to the school as the purchaser of those services.</p>

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	<p>What is being done to inform and develop employers for the students leaving the school under VR?</p>	<p>IVRS has a counselor assigned to every high school in Iowa who is charged with facilitating and/or providing transition services to eligible or potentially eligible candidates of IVRS. The primary goal of IVRS staff is to help a job candidate obtain, regain or maintain employment so staff are always making contacts within their communities with employers, as well as developing new ones. Additionally, for any IVRS job candidate who requires Supported Employment Services, IVRS staff contract with CRP partners that provide SES in order to contract out for these services.</p>
	<p>What is IVRS Employment Services? Just to fund or do the services include job development and placement by VR? If they rely only on providers there will be quite a long waiting list.</p>	<p>There are 14 different employment services that IVRS staff are able to contract for on behalf of an IVRS job candidate from CRP partners that have a contract with IVRS for employment services. Each of these 14 different employment services are explained in full detail in the Menu of Services Manual on the IVRS website: http://www.ivrs.iowa.gov/partners/CRPpage.html As mentioned in answering question 6, IVRS staff contract out for Supported Employment Services which includes Job Development. IVRS also contracts out for most of the other 14 employment services, however some services such as Job Shadowing Assessment, Transportation Training, Job Seeking Skills Training, Career Exploration and Non-Supported Job Coaching may be provided by IVRS staff. Each employment service that IVRS staff contract for through a community provider is determined on a case-by-case basis depending on the specific needs presented by an IVRS job candidate.</p>

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	<p>We have a work experience program for high school students prior to their graduating from school. We have no contract with the schools and we receive no funding. School staff come here with their students and supervise them and we pay the students for their time at work. This is totally unrelated to Medicaid. Can the districts continue this?</p>	<p>The final regulations of the WIOA legislation have not been released, but our current understanding of this legislation is that schools are not allowed to contract with CRPs to directly provide transition services to students into segregated programs. Schools are allowed to contract with CRPs for all services within an integrated community setting that are not sub-minimum wage. The key in this is that the work is integrated and meets the integration definition, most specifically that co-workers are not disabled and it is located in a business in the community</p>
Regions	<p>What obligations do Regions have for this service structure and these rates, with regard to contracting with providers, and can Regions wait until the July 2017 contracting period to implement this structure and these rates?</p>	<p>Regions are not obligated to adopt Medicaid service design or reimbursement.</p>